

**Vanida Khautisen, as Personal Representative)
of the Estate of Khouanexay Bill Sivilay,)**

PLAINTIFF,

V.

**BHG Holdings, LLC, and BHG XXXVIII,
LLC,**

DEFENDANTS.

C.A. No. 7:21-cv-03775-TMC

DEFENDANTS' EXPERT DISCLOSURES

Pursuant to the Federal Rules of Civil Procedure 26(a)(2)(b) and (c), Defendants BHG Holdings, LLC and BHG XXXVIII, LLC hereby designate the following retained experts witnesses and non-retained expert witnesses to testify at trial.

1. Randall L. Tackett, Ph.D.
155 Emerald Drive
Athens, Georgia 30605

Randall Tackett is currently a pharmacologist and toxicologist and a Professor at the University of Georgia College of Pharmacy. Mr. Tackett has reviewed the medical records of Trent Neal, the toxicology report of Trent Neal, and the accident report involving Plaintiff and Trent Neal. A copy of Randall Tackett, Ph.D.'s Expert Report is being served upon all counsel of record, as well as his Curriculum Vitae, fee schedule and a list of prior expert testimony.

2. Eric D. Morse, M.D., DFAPA
Carolina Performance

8300 Health Park, Suite 201
Raleigh, NC 27615

Dr. Eric Morse is an addiction psychiatrist with over twenty years of experience treating Opioid Use Disorder in Opioid Treatment Programs. He has reviewed the medical records of Trent Neal, the toxicology report of Trent Neal, BHG Policies and Procedures, South Carolina's State OTP Regulations, DEA/USDOJ Guidance OTP Statements, OTP Federal Regulations in 42 CFR Part 8, ASAM OUD treatment guidelines, SAMHSA COVID OTP Guidance Statements, and TIPS from SAMHSA on OUD. A copy of Dr. Eric Morse's expert report is being served upon all counsel of record, as well as his Curriculum Vitae, fee schedule and a list of prior expert testimony.

3. Edward Johnson, M.Ed., LPC, LAC/S, MAC, CS

Mr. Johnson is a Licensed Professional Counselor, Licensed Addiction Counselor, Licensed Addiction Counselor Supervisor and Certified Clinical Supervisor in the State of South Carolina. He is a nationally certified Master Addiction Counselor. He has over 30 years of experience working in the field of Addiction Treatment and Recovery. Mr. Johnson is a former OTP Administrator, the former Chair of the S.C. Association for the Treatment of Opioid Dependence, and S.C. Representative on the Board of Directors for the American Association for the Treatment of Opioid Dependence. He is currently the Associate Director for Training and Technical Assistance at the Southeast Addiction Technology Transfer Center at the National Center for Primary Care at the Morehouse School of Medicine. Mr. Johnson reviewed the following materials for this case: TIPS from SAMHSA on OUD; ASAM OUD treatment guidelines; OTP federal regulations in 42 CFR Part 8; SAMHSA COVID OTP guidance statements; DEA/USDOJ guidance OTP statements; South Carolina's state OTP regulations (DHEC); BHG policies and procedures; various professional journal articles related to harm reduction and overdose prevention; Mr. Neal's entire BHG medical record; and Mr. Neal's post-collision toxicology report. A copy of Mr. Johnson's expert report is being served upon all counsel of record, as well as his Curriculum Vitae and fee schedule. Mr. Johnson has not testified as an expert witness in the previous four years and has no publications to report.

4. Defendants may call as non-retained expert witnesses any employee or former employee of Defendants. These individuals may testify as to processes and procedures at Defendants' OTPs, their care, counseling, or treatment of Trent Neal, and/or standards of care in an OTP. Defendants' current or former employees may also testify regarding their OTP's compliance with state and federal laws and regulations. Their opinions will be based on their knowledge, skill and experience in working in or running OTPs, and/or their knowledge and experience in caring for Trent Neal as a patient at their OTP. While the specific individuals who may testify at trial have not yet been identified, Defendants will supplement this disclosure when such information becomes known.

s/ Chance M. Farr

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This the 6th day of September 2022.


Kennardy Jones, Paralegal